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9 Attorneys for Defendants
10 American Overseas Marine Corporation
11 and General Dynamics Corporation

12 UNITED STATES DISTRICT COURT
13 FOR THE
14 NORTHERN MARIANA ISLANDS

15 KENNETH COUTURE,

16 Plaintiff,

17 vs.

18 AMERICAN OVERSEAS MARINE
19 CORPORATION and GENERAL
20 DYNAMICS CORPORATION,

21 Defendants.

CIVIL ACTION NO. CV05-0024

DEFENDANTS' INITIAL
DISCLOSURES; CERTIFICATE
OF SERVICE

22 Defendants American Overseas Marine Corporation and General Dynamics Corporation,
23 by and through their Attorney of record, David Ledger, submit the following disclosure
24 statement pursuant to Fed. R. Civ. P. 26(a)(1) and LR 16.2CJ(d):

25 I. Persons likely to have Discoverable Information

26 1. Plaintiff and potentially any member of the crew serving with the plaintiff when
27 the initial injury occurred, a list is attached. Defendants are unaware of any eye-witness to the
28 injury. However, the following individuals have knowledge of the incident and injury: Captain
David Hagner, Chief Mate Dan Reed, 2nd A/E William Arnost, 1st A/E Charly Smith, Chief
Mate Peter Kirk, MSO Karl Englehart, Donald Farmer.

4810-9576-0128.1.053276-00011

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on this date

OCT 11 2005

Clerk
District Court
for The Northern Mariana Islands

EXHIBIT

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2. All health care providers who have treated the plaintiff.

II. Listing, Description and Location of Documents, Data Compilations and Tangible Things

1. See attached documents.

III. Description and Computation of Damages

Not applicable.

IV. Insurance Agreements


There is no "insurance policy" in the form you may be used to seeing. The vessel is entered with a UK-based protection and indemnity association. The vessel owner is a Member of the Association. The Association does not provide liability coverage in the traditional sense. Instead, the Association will indemnify the Owner for losses paid in accordance with Association Rules. You may view the Rules, and other information concerning insurance, at <http://www.standard-club.com>. Click "Enter", and then click on the drop-down category "Cover". We will provide you with a "Certificate of Entry" which shows that the Vessel is entered with the Association and that the Shipowner is a Member.

V. Expert Testimony

Defendants anticipate the need for two expert witnesses, but have yet to retain any.

DATED: October 11, 2005.

CARLSMITH BALL LLP


DAVID LEDGER
JOHN D. OSBORN
Attorneys for Defendants
American Overseas Marine Corporation
and General Dynamics Corporation

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 11th day of October 2005, I will cause to be served, via hand delivery, a true and correct copy of **DEFENDANTS' INITIAL DISCLOSURES** upon the following Counsels of record:

William M. Fitzgerald, Esq.
Law Office of William M. Fitzgerald
1st Floor, Macaranas Building
Post Office Box 909
Saipan, MP 96950

and

Bruce Berline, Esq.
Law Office of Bruce Berline
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Garapan, Saipan MP 96950

DATED: October 11, 2005.



DAVID LEDGER